

## REMARKS

### I. Introduction

In response to the Office Action dated November 26, 2007, which was made final, and in conjunction with the Request for Continued Examination (RCE) submitted herewith, claims 1, 2, 6, 7, 11 and 12 have been amended. Claims 1-15 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Prior Art Rejections

#### A. The Office Action Rejections

On pages (3)-(6) of the Office Action, claims 1, 2, 5-7, 10-12 and 15 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Bonney et al., U.S. Patent 6,339,439 (Bonney) and Workman et al., U.S. Publication 2004/0236754 (Workman). On pages (6)-(8) of the Office Action, claims 3, 4, 8, 9, 13 and 14 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Bonney, Workman and Haddad, U.S. Publication 2002/0111928 (Haddad).

Applicants' attorney respectfully traverses these rejections.

#### B. The Applicants' Independent Claims

Independent claims 1, 6 and 11 are generally directed to operating a graphics program in a computer. Claim 1 is representative and recites the step of performing one or more functions of a Sheet Set Manager in the graphics program, wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets and the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets and the Sheets contained within the Sheet Sets, as well as the Sheets contained within the Subsets of the Sheet Sets, and the Sheet Set Manager publishes a selected one of the Sheet Sets using a single operation.

#### C. The Bonney Reference

Bonney describes an information display device capable of displaying logical display planes includes a first part for storing items of display plane forming information respectively defined for

the logical display planes, and a second part for displaying the logical display planes on a screen part in accordance with the items of the display plane forming information, wherein the items of the display plane forming information of logical display planes that have a hierarchical relationship include information describing the hierarchical relationship and commonly own attribute information concerning a component commonly used in the logical display planes having the hierarchical relationship.

D. The Workman Reference

Workman describes a method of maintaining a bidirectional link between data in a file checked-out from a content management system to a user computer and data in at least one file maintained at the content management system is provided. In the method, a first file is scanned at least when it is one of checked in and checked out of the document management system to locate a link in the file. Information is gathered from the first file regarding a source and target of the link. It is determined if an element in the file is the source or the target. The information is stored in a database. The information in the database is automatically updated when a second file is corresponding to the other end of the link is checked in to the document management system to reflect changes made to the end of the link in the second file. The changes are applied to the information in the first file.

E. The Haddad Reference

Haddad describes a system for producing and distributing printed documents. The documents to be produced are classified into one or more document sets. The documents, and associated document processing information is then transmitted to a third party for production. The documents may then be delivered to one or more desired recipients. The documents are classified into document sets according to the document processing information, which may include production parameters, such as, format and media requirements like paper size and ink color. The document processing information can also include information relating to the recipients or production parties, such as printing, billing and delivery specifications.

F. The Applicants' Invention is Patentable Over the References

The Applicants' invention, as recited in amended independent claims 1, 6 and 13, is patentable over the combination of Bonney and Workman, as well as the combination of Bonney,

Workman and Haddad, because it recites a specific combination of elements not shown by the references.

The Office Action, on the other hand, asserts that all the elements of the independent claims are shown in the combination of Bonney and Workman. However, when placed in context, the combination of Bonney and Workman teach something different than Applicants' invention.

**1. Bonney does not describe a Sheet Set Manager.**

The Office Action asserts that Bonney teaches a CAD program capable of performing the functions of a Sheet Set Manager. At the locations indicated by the Office Action, however, Bonney merely describes drawings generally, where a drawing may include views and may be comprised of multiple sheets.

Consider, the description in Bonney found at the following cited locations:

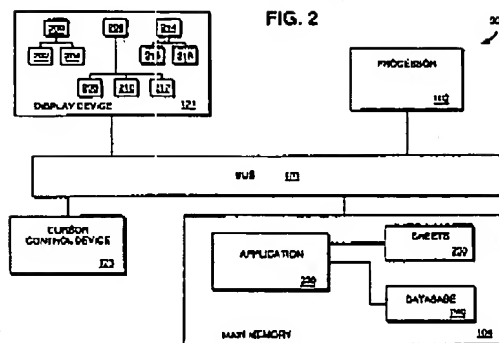
Bonney: Abstract

The invention includes computer instructions that receive an indication of a manipulation of one or more graphical icons by a user, where the graphical icons are interrelated to one another representing a hierarchical relationship among multiple objects of one or more sheets, and the sheets are included within a drawing by a computer aided design (CAD) application program. The computer instructions operate to automatically modify at least sheet order information included within the objects of the one or more sheets reflecting the hierarchical relationship among the multiple objects of one or more sheets based, at least in part, upon the received indication. As a result, hierarchical information on multiple drawing sheets are dynamically updated when a user modifies the hierarchical structure of the drawing sheets by manipulation icons representing the multiple drawing sheets, thereby saving the user effort in tracking the order information and opening each drawing sheet to modify the hierarchical information displayed on the drawing sheets. In one embodiment, the CAD application, including the computer instructions, is embodied in a distribution storage medium.

Bonney: col. 1, lines 26-36

Drawings, in general, may include many details of the models such as, but not limited to, alternative views, section views, detail views of certain aspects of each of the models, and in particular, assembly views to illustrate mating components of each of the models. Because so many aspects of the model(s) may be included within the drawing, the drawing may include many sheets, where each sheet illustrates a certain detail of a model. Depending upon the complexity of designs, a drawing may include numerous sheets showing many details.

Bonney: Fig. 2



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The above portions of Bonney do not describe a Sheet Set Manager that manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets and the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets and the Sheets contained within the Sheet Sets, as well as the Sheets contained within the Subsets of the Sheet Sets.

Specifically, Bonney says nothing about Sheet Sets containing both Subsets and Sheets. In addition, Bonney says nothing about Subsets of Sheet Sets containing Sheets. Finally, Bonney says nothing about a hierarchical relationship between Sheet Sets, Subsets of Sheet Sets, and Sheets.

Instead, the hierarchical relationship shown in FIG. 2 of Bonney refers only to relationships between sheets, i.e., each icon 200-218 in FIG. 2 is a sheet. Nowhere does FIG. 2 of Bonney refer to Sheet Sets containing both Subsets and Sheets, or Subsets of Sheet Sets containing Sheets.

Indeed, there is no recognition in Bonney of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification.

## 2. Workman does not describe a publishing a Sheet Set.

The Office Action admits that Bonney does not teach publishing a Sheet Set, but asserts that Workman does teach these claim elements at paragraphs 5 and 51. These cited portions of Workman are set forth below:

Workman: Para. 5

[0005] Any project set of drawings is made up of sheets, in which the various drawings that describe the project. Every drawing has at least two parts to it. The drawing title and the design. A drawing title is an annotation symbol that is part of a drawing and serves to identify that drawing. The drawing title includes such information as the drawing name, drawing number, sheet on which it resides, scale at which it is drawn and sometimes the project. Callouts, defined below, point to the drawing title. The design is the graphics that convey the design intent.

Workman: Para. 51

[0051] Maintaining bi-directional links between the link source and the link target allows either end of the link to be reviewed and verified from the other end of the link. For example, a designer can click on a given callout in a drawing. In response to this action, the link from the callout is traced to the target drawing and a rendition of the target drawing is published. Publishing encompasses plotting or printing to hard copy or digital format for review. This is preferably done without exiting the current design session. Options may be provided in the published view of the target drawing to close, redline, or open the drawing for editing. In a similar manner, if a user clicks on a given drawing title (link target), the link from that drawing is traced and a list of all the drawings that point to this drawing as their link target is displayed. Options may be provided in the published view to view any one of the listed drawings, after which the options just mentioned regarding the published view may also be provided. Access to the various functionality can be provided either through tools included in the design program or through a separate interface.

The above portions of Workman do not describe a Sheet Set Manager that publishes a selected one of the Sheet Sets using a single operation. Specifically, Workman says nothing about Sheet Sets containing both Subsets and Sheets, and the ability to publish a Sheet Set using a single operation.

Instead, the above portions of Workman merely describes publishing as comprising plotting or printing drawings generally, and the publishing of a single target drawing traced from a callout link specifically. Indeed, there is no recognition in Workman of the concept of publishing a Sheet Set in a single operation, where the Sheet Set is comprised of Subsets of Sheet Sets and Sheets, as those terms are defined in Applicants' claims and specification.

Moreover, Workman, like Bonney, does not describe a Sheet Set Manager that manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets and the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets and the Sheets contained within the Sheet Sets, as well as the Sheets contained

within the Subsets of the Sheet Sets.

**3. Haddad does not overcome the deficiencies of Bonney and Workman.**

Recall that Haddad was cited only against dependent claims 3, 4, 8, 9, 13 and 14, and only for teaching the editing of print parameters.

However, Haddad, like Bonney and Workman, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

**4. Summary.**

In summary, Applicants' attorney submits that independent claims 1, 6 and 11 are allowable over Bonney, Workman and Haddad. Further, dependent claims 2-5, 7-10 and 12-15 are submitted to be allowable over Bonney, Workman and Haddad in the same manner, because they are dependent on independent claims 1, 6 and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5, 7-10 and 12-15 recite additional novel elements not shown by Bonney, Workman and Haddad.

**III. Conclusion**

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

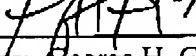
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Date: February 26, 2008

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G&C 30566.321-US-01